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MICHAEL A. CARDOZO
Corporation Counsel

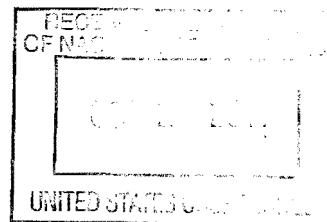
**THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007**

BRIAN FRANCOLLA
Assistant Corporation Counsel
Tel.: (212) 788-0988
Fax: (212) 788-9776

October 25, 2011

BY FACSIMILE: (212) 805-7927

Honorable Naomi Reice Buchwald
United States District Judge
United States District Court
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007



Re: Felicia Bailey v. City of New York, et al., 11 CV 4181 (NRB) (GWG)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department recently assigned to handle the defense of the above-referenced matter on behalf of defendant City of New York. In that capacity, I write jointly with plaintiff's counsel, Robert Marinelli, Esq., to advise the Court as to how the parties intend to proceed with this litigation. In that regard, it appears that settlement is unlikely at this time and that the parties will need to proceed further with discovery. Accordingly, the parties respectfully request that the Court set a discovery schedule and that we be permitted until March 23, 2012, in order to complete all discovery. Furthermore, the parties propose that any amendment to the pleadings take place on or before November 11, 2011.

In view of the foregoing, it is respectfully requested that the Court grant the within requests. Thank you for your consideration herein.

MEMO ENDORSED

Respectfully submitted,

Brian Francolla
Assistant Corporation Counsel
Special Federal Litigation Division

The proposed schedule is acceptable on condition that there will be no extensions of the party's proposed schedule.

Approved schedule.
Is Dated.

To Robert
Sam Leek Beckus, M.D.
October 26, 2011

cc: Robert Marinelli, Esq. (by fax)
Attorney for Plaintiff
305 Broadway, 14th Floor
New York, New York 10007
Fax: (212) 822 1428